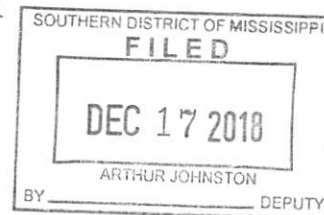


Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the  
Southern District of Mississippi  
Eastern Division



Case No.

2:18cv216-KS-MTP  
 (to be filled in by the Clerk's Office)

Jury Trial: (check one)

☒ Yes ☒ No

*dim +  
R.D.M.  
12/15/18*

Rodney Davis-Moyle

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Murray Bresky -v-

Joe Frank Sanderson

Dean Kilpatrick

Robin Robinson

Lana Crayke

M.B. Processing (Murray's Chicken) + Sanderson Farms Inc.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Rodney Davis-Moyle

E.L.L. 7.9.9.5  
Monarch 3.8.7

Street Address

504 Melba Ave

City and County

Hattiesburg / Forrest

State and Zip Code

MS / 39401

Telephone Number

845-777-5010

E-mail Address

staving573@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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## Defendant No. 1

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Joc FRANK Sanderson  
Owner Sanderson Farms  
127 Flynt Rd  
Laurel / Jones  
MS / 39443  
800-844-4030  
—

(5) Omit  
Perry Houser  
Plant Manager <sup>Sanderson Farms</sup>  
127 Flynt Rd  
Laurel / Jones  
MS / 39443  
800-844-4030  
—

## Defendant No. 2

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Robin Robinson  
Organizational Manager Sanderson Farms  
127 Flynt Rd  
Laurel / Jones  
MS / 39443  
800-844-4030  
—

## Defendant No. 3

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Lana Crandell  
Part Owner M.B. Processing  
P.O. Box 805  
Woodridge / Sullivan  
New York / 12789  
2 - - -  
—

(6)  
Murray Breskey  
Owner Murrays Chicken  
5190 Main St.  
South Fallsburg / Sullivan  
New York / 12779  
845-434-5051  
—

## Defendant No. 4

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

~~Sophia Applewhite~~  
—  
76 Moses Ln  
Prentiss / Jefferson Davis  
MS / 39474  
—  
—

(7)  
Dean (Breskey) Kalpatrick  
Chief Operating Officer  
5190 Main Street  
South Fallsburg / Sullivan  
New York / 12779  
845-434-5051  
—

Sandersen Farms Inc  
127 Flynt Rd  
Laurel, MS 39443  
ph. 800-844-4030

Murrays Chicken  
Mi B. Processing  
5190 Main Street  
South Fallsburg, NY 12789  
ph. 845-434-5051.

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. *Title VII Civil Rights Act, American with Disabilities Act 1990  
U.S. Code 28 Title 28  
Part VI, Defamation, Slander, + emotional distress.*

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Rodner Davis Moab, is a citizen of the  
State of (name) Mississippi.

**b. If the plaintiff is a corporation**

The plaintiff, (name) N/A, is incorporated  
under the laws of the State of (name) N/A,  
and has its principal place of business in the State of (name)  
N/A.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) Joe F. Sanderson, is a citizen of  
the State of (name) Mississippi. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

- b. If the defendant is a corporation Dean Kilpatrick  
Murray Bresky  
 The defendant, (name) Joe Frank Sanderson, is incorporated under  
 the laws of the State of (name) Mississippi / New York, and has its  
 principal place of business in the State of (name) Mississippi / New York  
 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
 and has its principal place of business in (name) Mississippi / New York.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

### 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

The law has been broken.

## III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

As are around May 12, 2015 I met Lena Crandell (66 Davis Pointe Woodbridge, NY 1195 Davis Road Apt 2 Woodbridge, NY) she advised me to speak with Dean Kilpatrick (Bresky) who hired me as a supervisor & promoted me to Asst. Plant Manager. He & Murray Bresky, did not tell me of ownership and relations to Ms. Crandell. Dean advised me that Sanderson Farms, Robin Robinson, Joe Frank Sanderson, and Perry Houser who told me I'd wanted to work for them I would have to "suck all their dick like my dad". Robin Robinson entered my dwelling pretending to be someone else, & Joe Frank & Dean Kilpatrick who told me I had to have sex with him to keep my position, and latter offered Joe Sanderson, & Dean Kilpatrick has slandered my name in industry, caused emotion distress treated my family, friends, and see attached community and have caused undue hardship & emotional distress while standering my name, my family, and called Bill Bryant at D.G. Foods & forced him to fire me.

## IV. Relief

Ms. Robinson has defrauded me while entering my dwelling, bribing & tormenting employees to not hire me for personal reasons. Cause I have a child by Joe Sanderson Family Robin Robinson

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I seek 330 million from Sanderson Farms & M.B. Processing  
Murray's chicken, in which they sold my business, and failed to inform me  
it was living with there family members while employed. Joe Sanderson & Sanderson  
Farms employees has harassed me, my family, friends, and his employee Perry Houser  
me if I wanted to work for Sanderson Farms I could suck all their dick like my dad did.  
Dean Kilpatrick, Robin Robinson, Lena Crandell all knowing found me working in mgmt for  
Highliner Foods in VA, and forced D.G. Foods to fire me. Dean, Joe, & Robin has caused  
me to end my career in the South, North in Industry by making false  
claims, of Slander, Assault, & Libel while stealing business logs, sojgods  
and placing employees in my dwelling to steal personal information.  
I can never work in poultry industry again. 330 million.

An sent  
Shipping Mgr.  
Wilbur Myers  
to my home  
in New York.  
When I was not  
employed &  
M.P. Flecher.



**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_

12/19/18

Signature of Plaintiff

Printed Name of Plaintiff

*RDM -*  
*Rodney Davis - MUGS*

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address